

ADDENDUM TO THE FACT SHEET  
FOR NATIONAL POLLUTANT DISCHARGE  
ELIMINATION SYSTEM (NPDES)  
PERMIT NO. WA0040029

I. GENERAL INFORMATION

Facility: Allweather Wood Treaters  
725 South 32nd Street  
P.O. Box 227  
Washougal, WA 98671

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on July 17, 2002, and accepted by the Department on July 24, 2002. The scope and manner of any review of an application for replacement of permit by the Department shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the permittee's production levels; permittee's waste treatment practices; nature, content, and frequencies of permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-216 and WAC 173-200.

On September, 2002, Allweather Wood Treaters (Allweather) was inspected and all available information was reviewed. The inspection and review indicate that Allweather will be ready to meet final permit limits at Outfall 001 on September 1, 2003, when the electrocoagulation stormwater treatment system is upgraded to treat 6-month 24-hour design storm.

III. CHANGES TO THE PERMIT

The final chromium limitation for Outfall 001 will change from 605 micrograms ( $\mu\text{g/L}$ ) per liter to 770  $\mu\text{g/L}$  to reflect addition of Outfall 002 at the Final Effluent Limitations section, Table 1. The calculation and discussion of the final effluent limitations are presented in the fact sheet.

**Table 1 Final Effluent Limitations: Outfall 001.**

	FINAL EFFLUENT LIMITATIONS: OUTFALL 001	
Parameter	Average Monthly <sup>a</sup>	Maximum Daily <sup>b</sup>
pH (standard units)	between 6 and 9	

	<b>FINAL EFFLUENT LIMITATIONS: OUTFALL 001</b>	
<b>Parameter</b>	<b>Average Monthly<sup>a</sup></b>	<b>Maximum Daily<sup>b</sup></b>
Oil and Grease (mg/L)	N/A	10
TSS (mg/L)	N/A	80
Arsenic (µg/L)	N/A	340
Chromium (µg/L)	N/A	770
Copper (µg/L)	N/A	36
Chromium (hexavalent)	N/A	48
<sup>a</sup> The average monthly effluent limitation is defined as the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.		
<sup>b</sup> The maximum daily effluent limitation is defined as the highest allowable daily discharge. The daily discharge means the discharge of a pollutant measured during a calendar day. For pollutants with limitations expressed in units of mass, the daily discharge is calculated as the total mass of the pollutant discharged over the day. For other units of measurement, the daily discharge is the average measurement of the pollutant over the day.		

The permit will include final limits for Outfall 002 discharging stormwater from untreated wood storage area, Table 2. Copper [ $18 \times 4.5 = 81$  µg/L] and hexavalent chromium [ $16 \times 4.5 = 72$  µg/L] limitations are based on water quality with. Allweather is allowed a dilution factor of 4.5.

**Table 2 Final Effluent Limitations: Outfall 002**

	<b>FINAL EFFLUENT LIMITATIONS: OUTFALL 002</b>	
<b>Parameter</b>	<b>Average Monthly<sup>a</sup></b>	<b>Maximum Daily<sup>b</sup></b>
pH (standard units)	between 6 and 9	
Oil and Grease (mg/L)	N/A	10
TSS (mg/L)	N/A	80
Arsenic (µg/L)	N/A	340
Chromium (µg/L)	N/A	460
Copper (µg/L)	N/A	81
Chromium (hexavalent)	N/A	72
<sup>a</sup> The average monthly effluent limitation is defined as the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.		
<sup>b</sup> The maximum daily effluent limitation is defined as the highest allowable daily discharge. The daily discharge means the discharge of a pollutant measured during a calendar day. For pollutants with limitations expressed in units of mass, the daily discharge is calculated as		

	<b>FINAL EFFLUENT LIMITATIONS: OUTFALL 002</b>	
<b>Parameter</b>	<b>Average Monthly<sup>a</sup></b>	<b>Maximum Daily<sup>b</sup></b>
the total mass of the pollutant discharged over the day. For other units of measurement, the daily discharge is the average measurement of the pollutant over the day.		

The compliance schedule, Special Condition S.10, will change to reflect that the final electrocoagulation stormwater treatment system upgrade will be in place by September 1, 2003.

Frequency of the Oil and Grease (O&G) effluent monitoring has been adjusted from quarterly to monthly to match frequency of O&G influent monitoring. Frequency of the influent monitoring requirement has been reduced after September 1, 2005, from monthly to semiannually.

As a result of the recent Environmental Protection Agency (EPA)—Treating Industry Agreement on Chromated Copper Arsenate (CCA) Wood Treating Solution, Allweather will be converting to ammoniacal copper quat (ACQ) wood treating solution during 2003.

#### IV. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to Allweather Wood Treating for the discharge of stormwater to Gibbons Creek. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet addressed conditions and issues at the facility at the time when the previous permit was issued, and statements made reflected the status in that time. Since the issuance of the current permit, the Department has not received any information which indicates that environmental impacts from the discharge that were not evaluated at the time of the last permit issuance is persuasive enough to undertake a complete renewal of the permit. The reauthorized permit is virtually identical to the previous permit issued on February 8, 2001.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

The only changes to the previous permit are the submittal date requirements. Submittal requirements from the previous permit that were completed and submitted and do not require additional or continued assessment were removed from this permit. The submittal dates for the other standard compliance and submittal requirements that have been carried over from the past permit into this reauthorized permit have been adjusted to the proposed permit schedule. The Department considered these submittals necessary in the previous permit and no information has come forward to cause a reconsideration of the submittal requirement.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A—Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix D—Response to Comments.

V. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be issued for five years starting March 1, 2003.

## **APPENDIX A – PUBLIC INVOLVEMENT INFORMATION**

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on July 14, 2002, and July 21, 2002, in *The Columbian* to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department will publish a Public Notice of Draft (PNOD) on December 31, 2002, in *The Columbian* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet addendum, and fact sheet are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Industrial Unit Permit Coordinator  
Department of Ecology  
Southwest Regional Office – Water Quality  
PO Box 47775  
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (360) 407-6280, or by writing to the address listed above.